

**Public Comment of Thomas B. Harding, Jr.  
National Organic Standards Board  
Wednesday, September 17, 2002  
Washington, D.C.**

**FOR**

**KANSAS CITY INGREDIENT TECHNOLOGIES, INC.  
SUPPORTING THE INCLUSION OF TETRASODIUM  
PYROPHOSPHATE (TSPP) to the NATIONAL LIST**

Good Morning Ladies and Gentlemen of the National Organic Standards Board (NOSB). I thank you for allowing me this opportunity to present my comments on behalf of Kansas City Ingredients Technologies, Inc. (KCIT) in support of their NOSB Materials Petition for the Inclusion of Tetrasodium Pyrophosphate (TSPP) to the National List.

It is not my intention to repeat again what Dr. Bassi has already said, but only to further support his comments and add a few additional points.

As the Organic Program Consultant for several leading organic producer groups and value-added organic handlers, my first approach is to take a minimalist and practical-technical approach to both materials selection and use for the production of certified organic ingredients and products. This is precisely what we did when choosing **TSPP**.

Our basic objective was to utilize, if possible, a material already on the **National List** or its parent analogue which would provide us with the unique processing properties and benefits required to make these high quality and functional organic ingredients.

As it turned out **Sodium Phosphate** was on the **National List** and met our criteria; however the *annotation restricted* the analogue and its use to only dairy foods. We do not know why these restrictions were placed on this material, it only seems fair that all organic food product categories are given equal treatment in order to maintain consistency and creditability to the **National List**.

**TSPP** easily met all elements of the *NOSB Materials Petition Evaluation Criteria* our Materials Petition for TSPP Inclusion was submitted to the NOSB TAP Review Process for NOSB approval to add the **TSPP** analogue and broaden the **Sodium Phosphate** annotation to include “*milled and processed grain-based foods*” to the **National List**.

Clearly **TSPP** is an excellent processing materials choice to produce safe, functional and high quality organic ingredients for use in certified organic meat-alternative products requiring meat-like properties with high quality fully digestible textured vegetable proteins (TVP).

Allow me to point out, although organic gluten is one of the baseline ingredients in our *organic product* – our organic ingredient (product) is not *seitan*!

**TSPP** is used in conjunction with **organic** grain-based ingredients at low levels – i.e. .5% - to 3.5% to make certified organic ingredients which are used as *organic ingredients* at levels between 10% to 12% or less in the finished shelf-ready organic products. These certified organic ingredients and products are found throughout the organic industry. All of these organic ingredients and the organic products and made with organic products have high consumer acceptance and are certified by responsible, accredited certifiers.

As Dr. Bassi has clearly stated we have searched out and tested several other materials, some on the **National List** and recommended by the **TAP Reviewers**. To date we have found no equals to **TSPP** and none perform at these low levels and provide the extraordinary functional and quality properties as does **TSPP**. Most bring to the table unwanted odor, taste, discoloration and poor protein qualities in the finished organic ingredients.

In closing I ask the NOSB to **approve** the KCIT Petition to add **TSPP** to the **National List** to be used in “*organic milled and processed grain-based foods*”. Please reference (copy herewith) the formal comments from one of the end users of these organic ingredients also supporting this Petition!

Thank you.



Boca Foods 910 Mayer Avenue • Madison, WI 53704  
Phone: (608) 285-6950 • Toll Free: (800) 422-6950 • Fax: (608) 242-6153

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TO: Ms. Katherine Benham, National Organic Standards Board  
FROM: Julie Simonson, R&D Manager, Boca Foods  
DATE: September 13, 2002  
SUBJECT: Support for TSPP Materials Petition

Boca Foods would like the National Organic Standards Board to know that Boca supports the Materials Petition to add Tetrasodium Pyrophosphate (TSPP) to the National List. The approval of TSPP should be for use in organic product ingredients, which are utilized in the production of organic products.

Boca Foods is a major manufacturer of meat alternative products for the natural foods channel. Our line of certified organic "made with organic soy" meatless burgers and breakfast products currently contains certified organic product ingredients containing TSPP.

Any reformulation of our meat alternative products without the use of TSPP will cause considerable hardship and could significantly impact the quality and consumer value of our products.

Therefore, we ask the National Organic Standards Board to approve the Materials Petition submitted by Kansas City Ingredients Technology (KCIT) to add TSPP to the National List of materials to be used in organic products.

Thank you for considering our support for this petition.

*Julie Simonson*